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Technology Center 2100

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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Applicants: A. TOMITA, et al

Serial No.: 09/810,548

Filed: March 19, 2001

For: METHOD FOR TRANSFORMING DATA FORMATS BETWEEN  
DIFFERENT DATABASE SYSTEMS, AN APPARATUS FOR  
EXECUTING THE METHOD, AND THE PROGRAM OF THE  
METHOD

Group: 2171

Examiner: H. Alaubaidi

**RESPONSE**

Commissioner for Patents  
P.O. Box 1450  
Alexandria, VA 22313-1450  
Sir:

September 29, 2004

The following is in response to the June 29, 2004 Office Action.

The present application has pending claims 1, 3, 5 and 7-18. No  
amendments were made to these claims.

Applicants' Attorney, the undersigned, strongly urge the Examiner to contact  
Applicants' Attorney by telephone so as to schedule an interview prior to examination  
of the present application based on the present response.

In the June 29, 2004 Office Action, the Examiner rejected claims 1, 3, 5, 7, 8,  
10 and 14-28 under 35 USC §103(a) as being unpatentable over Nishizawa (U.S.  
Patent No. 6,549,598) in view of Suzuki (U.S. Patent No. 6,125,304); rejected claims  
9 and 12 under 35 USC §103(a) as being unpatentable over Nishizawa in view of

Brown (U.S. Patent No. 6,636,808); and rejected claims 11 and 13 under 35 USC §103(a) as being unpatentable over Nishizawa in view of Suzuki and further in view of Brown. These rejections are traversed for the following reasons. Applicants submit that the features of the present invention as now recited in claims 1, 3, 5 and 7-18 are not taught or suggested by Nishizawa, Suzuki or Brown whether taken individually or in combination with each other as suggested by the Examiner. Therefore, Applicants respectfully request the Examiner to reconsider and withdraw these rejections.

Various arguments were presented distinguishing the features of the present invention in the Remarks of the March 30, 2004 Amendment, said Remarks being incorporated herein by reference. In addition to said Remarks, the following is provided.

In the Office Action, the Examiner made numerous incorrect and unsupported allegations. The following are examples of such allegations.

In the paragraph bridging pages 4 and 5 of the Office Action, the Examiner recognizes that Nishizawa:

“does not explicitly indicate that one format of the data is used for an application executed on one database on the other format of the data (the data format that was converted to) is used for an application executed on another database”.

However, in the Office Action the Examiner points to a teaching in Nishizawa that the application on the client computer is an associated database. The Examiner extrapolates from this skeletal teaching that:

"it would have been obvious to a person of ordinary skill in the art at the time of Applicants invention to convert data from one format to another for many reasons such as, compatibility and to allow for a maximum use of a system when more than one format can be recognized. Further, more converting data formats from one type to another is well known and whether the different formats are used in two different applications of two different databases or whether the different formats are used to convert data for two different devices such as from voice to text or the opposite, no weight will be given to it as it is merely reciting the purpose and the intended use of the data conversion".

This above describe allegation by the Examiner is completely unsupported and entirely misses the point of Applicants invention. In fact, the teaching in Nishizawa relied upon by the Examiner cannot in anyway render obvious the explicit features recited in the claims of transforming data having a format which is used for an application executed on one database system into data having another data format which is used for an application executed on another database system as in the present invention as recited in the claims. This is clearly evident being that the Nishizawa merely describes the conversion of data from a format as stored on the disk units to a format usable by different types of application programs. However, at no point is there any teaching or suggestion in Nishizawa of the conversion of data from format used by an application executed on one database system into data of a format usable by another application executed on another database system as in the present invention. Thus, as recognized by the Examiner according to the present invention as recited in the claims two different types of applications being executed by two respectively different database systems is required. Such is clearly not taught or suggested by Nishizawa.

Since Nishizawa is wholly deficient of numerous features of the present invention as recited in the claims and the Examiner is merely making unsupported allegations using Nishizawa, the Examiner is respectfully requested to either cite a new reference to support his allegations, point to some other teaching in Nishizawa which could lend credence to his arguments, or withdraw the allegation.

Further, in the Office Action in the paragraph bridging pages 5 and 6, the Examiner further recognizes that Nishizawa does not explicitly indicate the various limitations recited in the claims regarding the elements included in the request. The Examiner attempts to supply these deficiencies of Nishizawa by combining Nishizawa with Suzuki and/or Brown.

In the Office Action, the Examiner alleges that Nishizawa teaches all of the claimed subject matter with the exception of two of the limitations of the content of a request and that Suzuki teaches "all of the three limitation" of the request as recited in the claims. However, at no point has the Examiner identified where any teaching can be found in either Nishizawa or Suzuki of the request itself and of the first limitation of the request namely information for specifying the data format transformation program as recited in the claims.

Applicants have fully reviewed the Office Action and determined that the Examiner has failed to identify any teaching in any of the references of record, particularly Nishizawa, Suzuki or Brown, regarding the information for specifying the data format transformation program as recited in the claims. Thus, the Examiner's Office Action is completely deficient of any allegation of such teaching and therefore the Examiner has not made a *prima facie* case of obviousness when combining the

teachings of Nishizawa, Suzuki and Brown to meet the limitations recited in the claims.

Thus, Nishizawa, Suzuki and Brown whether taken individually or in combination with each other fail to teach or suggest the features of the present invention as recited in the claims. Therefore, reconsideration and withdrawal of the above described rejection of the claims under 35 USC §103(a) is respectfully requested.

Applicants submit that the features of the present invention as recited in the claims are not taught or suggested by the remaining references of record.

In view of the foregoing, Applicants submit that claims 1, 3, 5 and 7-18 are in condition for allowance. Accordingly, early allowance of the present application based on claims 1, 3, 5 and 7-18 is respectfully requested.

To the extent necessary, the applicants petition for an extension of time under 37 CFR 1.136. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, or credit any overpayment of fees, to the deposit account of Antonelli, Terry, Stout & Kraus, LLP, Deposit Account No. 01-2135 (520.39598X00).

Respectfully submitted,

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